

Fill in this information to identify the case:

Debtor 1 BRUNO SANCHEZ

Debtor 2 DEBORAH JILL SANCHEZ AKA DEBORAH J. COHEN AKA DEBORAH J. SANCHEZ AKA DEBORAH JILL COHEN  
(Spouse, if filing)

United States Bankruptcy Court for the: MIDDLE District of: PA (State)

Case number 19-04962-MJC

## Form 4100R

# Response to Notice of Final Cure Payment

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

### Part 1: Mortgage Information

Name of creditor: U.S. Bank Trust National Association, not in its individual capacity, but solely as Owner Trustee for Citigroup Mortgage Loan Trust 2021-RP5 c/o Rushmore Loan Management Services, LLC

Court claim no. (if known):  
09

Last 4 digits of any number you use to identify the debtor's account:

9 6 1 8

Property address: 1421 SUNSET LANE

Number Street

STROUDSBURG PA 18360  
City State ZIP Code

### Part 2: Prepetition Default Payments

Check one:

- ☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.
- ☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ \_\_\_\_\_

### Part 3: Postpetition Mortgage Payment

Check one:

- ☐ Creditor states that the debtor(s) are current with all post-petition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on:

MM / DD / YYYY

- ☒ Creditor states that the debtor(s) are not current on all post-petition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

a. Total post-petition ongoing payments due:

(a) \$ 0.00

b. Total fees, charges, expenses, escrow, and costs outstanding:

\*\*NOTICE OF PPFN FILED ON  
04/09/2020\*

+ (b) \$ 800.00

c. **Total.** Add lines a and b.

(c) \$ 800.00

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

01/01/2023

MM / DD / YYYY

**Part 4: Itemized Payment History**

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all post-petition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

**Part 5: Sign Here**

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box::

- ☐ I am the creditor.
- ☒ I am the creditor's authorized agent.

**I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.**

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

**X** /s/ Sarah K. McCaffery, Esquire Date 12/28/2022  
Signature

Print Sarah K. McCaffery, Esquire Title Attorney  
First Name Middle Name Last Name

Company Hladik, Onorato & Federman, LLP

**If different from the notice address listed on the proof of claim to which this response applies:**

Address 298 Wissahickon Avenue  
Number Street  
North Wales, PA 19454  
City State ZIP Code

Contact phone (215) 855- 9521

Email smccaffery@hoflawgroup.com

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In Re:	: Bankruptcy No. 5:19-bk-04962-MJC
Bruno Sanchez	: Chapter 13
Deborah Jill Sanchez	
aka Deborah J. Cohen	
aka Deborah J. Sanchez	
aka Deborah Jill Cohen	
Debtor	:
U.S. Bank Trust National Association, not in	:
its individual capacity, but solely as Owner	:
Trustee for Citigroup Mortgage Loan Trust	
2021-RP5 c/o Rushmore Loan Management	
Services, LLC	
Movant	:
vs.	:
	:
Bruno Sanchez	:
Deborah Jill Sanchez	
aka Deborah J. Cohen	
aka Deborah J. Sanchez	
aka Deborah Jill Cohen	
Debtor/Respondent	:
and	:
Jack N. Zaharopoulos, Esquire	:
Trustee/Respondent	:

**CERTIFICATE OF SERVICE**

I, Sarah K. McCaffery, Esquire, hereby certify that I caused to be served true and correct copies of the **RESPONSE TO NOTICE OF FINAL CURE PAYMENT** at the respective last known address of each person set forth below on December 28, 2022:

Vincent Rubino, Esquire  
Via Electronic Filing  
*Attorney for Debtors*

Jack N. Zaharopoulos, Esquire  
Via Electronic Filing  
*Trustee*

Bruno Sanchez  
Deborah Jill Sanchez, et al.  
1421 Sunset Lane  
Stroudsburg, PA 18360  
Via First Class Mail  
*Debtors*

Date: 12/28/2022

Respectfully Submitted,  
/s/Sarah K. McCaffery, Esquire  
Sarah K. McCaffery, Esquire  
Hladik, Onorato & Federman, LLP  
298 Wissahickon Avenue  
North Wales, PA 19454  
Phone 215-855-9521  
Fax 215-855-9121